# UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF VIRGINIA HARRISONBURG DIVISION

IN RE:	
CYNTHIA DEAVER FORSMAN, dba CYNTHIA D. FORSMAN, fka CYNDI M. SEAY, fka CYNTHIA DEAVER-SEAY, Debtor.	CHAPTER 13 CASE NO.: 19-50909
JPMORGAN CHASE BANK, N.A.  Movant,  V.  CYNTHIA DEAVER FORSMAN, dba CYNTHIA D. FORSMAN, fka CYNDI M. SEAY, fka CYNTHIA DEAVER-SEAY, Debtor, HERBERT L BESKIN, Trustee,	FILED PURSUANT TO 11 U.S.C SECTION 362
Respondents.	

# **NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that JPMorgan Chase Bank, N.A. has filed a Motion for Relief from the Automatic Stay and related papers with the Court seeking an order granting relief from the automatic stay to enable it to proceed to enforce its remedies pursuant to its contract referencing the subject property, a 2016 Subaru WRX (VIN: JF1VA1B68G9822230).

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the motion via Zoom Video Conference at 9:30am on June 28, 2022.

To obtain a Zoom Meeting ID number for any of the above dates, please email VAWBml\_Connelly\_Scheduling@vawb.uscourts.gov.

#### Your rights may be affected. You should read these papers carefully and discuss

Brand R. Jordan VA Bar No. 72170 Robertson, Anschutz, Schneid, Crane & Partners, PLLC 11900 Parklawn Drive, Suite 310 Rockville, MD 20852 Phone: 470-321-7112, ext. 293

Fax: (240) 238-2767 Email: bjordan@raslg.com Attorney for Movant them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then within the time specified in the Court's pre-hearing order, you or your attorney must:

File with the court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

Clerk of Court U. S. Bankruptcy Court 116 N. Main St. Room 223 Harrisonburg, VA 22802

You must also mail a copy to:

Brandon R. Jordan

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

11900 Parklawn Drive, Suite 310

Rockville, MD 20852

And to:

Herbert L Beskin Chapter 13 Trusteeship 123 East Main St., Ste. 310 Charlottesville, VA 22902

If you mail rather than deliver, your response to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the court will receive within the time specified in the Court's pre-hearing order.

Date: May 26, 2022

### Robertson, Anschutz, Schneid, Crane & Partners, PLLC

# /s/ BRANDON R. JORDAN

Brandon R. Jordan VA Bar No. 72170 Robertson, Anschutz, Schneid & Crane LLC 11900 Parklawn Drive, Suite 310 Rockville, MD 20852

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# **CERTIFICATE OF SERVICE**

I certify that I am over the age of 18 and that on May 26, 2022 a copy of the foregoing

Notice of Motion was mailed first-class, postage prepaid, to:

Cynthia Deaver Forsman 72 Lofty Circle Stuarts Draft, VA 24477

And via electronic notice to:

Roland S. Carlton, Jr. Carlton Legal Services, PLC 118 MacTanly Place Staunton, VA 24401

Herbert L Beskin Chapter 13 Trusteeship 123 East Main St., Ste. 310 Charlottesville, VA 22902

US Trustee Office of the United States Trustee 210 First Street, Suite 505 Roanoke, VA 24011

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

/s/ BRANDON R. JORDAN

Brandon R. Jordan